

**Commonwealth of Kentucky
Division for Air Quality**

RESPONSE TO COMMENTS

ON THE TITLE V DRAFT PERMIT NO. V-03-041
COOPER- STANDARD AUTOMOTIVE INC
MOUNT STERLING, KY 40353

December 8, 2003

Esmail T Hassanpour, Reviewer

Plant I.D. #: 21-173-00030

Application Log #: 54742

SOURCE DESCRIPTION:

Cooper – Standard has applied to the Division for Air Quality for renewal of their Title V permit. The operation at the facility has not changed since issuance of the initial Title V. The facility main operations include rubber extrusion and curing, and then cooling and cutting operations.

The plant produces automotive reinforced rubber hose and Multi-Layered Plastic Tubing (MLT) in various diameters, lengths, and shapes. The main raw materials involved in hose production are rubber and reinforcing yarn. Secondary raw materials include adhesive and lubricant. The raw material involved in the MLT production is plastic pellets. The processes involved in reinforced rubber hose production include the extrusion of rubber on the Knit/Spiral Hose Lines #1, #2, and #3, printer stations for the customer, adhesive application operations, rubber curing in the Autoclaves, and the hose finishing operations. Un-reinforced scrap rubber is processed on an off-line mill for reuse in production. The processes involved in the MLT production include plastic extrusion and forming. Steam generated by two boilers are used to cure the rubber reinforced hoses and for the MLT forming operations.

PUBLIC AND U.S. EPA REVIEW:

On October 23, 2003, the public notice on availability of the draft permit and supporting material for comments by persons affected by the plant was published in The Mt. Sterling Advocate in Mount Sterling, Kentucky. The public comment period expired 30 days from the date of publication.

Comments were received from Cooper Tire & Rubber Company on November 21, 2003. Attachment A to this document lists the comments received and the Division's response to each comment. Minor changes were made to the permit as a result of the comments received, however, in no case were any emissions standards, or any monitoring, recordkeeping or reporting requirements relaxed. Please see Attachment A for a detailed explanation of the changes made to the permit. The U.S. EPA has 45 days to comment on this proposed permit.

ATTACHMENT A

Response to Comments

Comments on Cooper Tire & Rubber Company Draft Title V, synthetic Minor Air Quality Permit submitted by Russell E. Burton, Environmental, Health & Safety Coordinator.

Public Notice Comments/Corrections

1. The first paragraph of the public notice stated the following: "The plant is classified as a Title V major source due to its emissions of criteria and regulated air pollutants." Please note that Cooper's permit is a Synthetic Minor, Title V, Operating Permit as reflected throughout the draft Title V permit.

Division's Response:

The Division acknowledges the comment and offers the following explanation to clarify the terms "synthetic minor" and Title V major source". A synthetic minor source is a source that has taken federally enforceable limits to preclude the applicability of 401 KAR 51:017, prevention of significant deterioration of air quality (PSD). For Title V purpose, a major source is defined as a stationary source which emits or has the potential to emit above a major source threshold, which generally is 100 tons per year. Therefore the public notice is correct as written. The source is a Title V major source.

Draft Permit Comments/Corrections

1. The Emissions Summary table, located in section A of the permit, shows the plant having the potential VOC emissions of 225 tpy. However, as the attached table shows, Cooper believes that this total should be 182.4 tpy of VOC. Please modify the permit to reflect this number.

Divisions Response:

Comment acknowledged. However, the basis for the 225 tons per year of volatile organic compounds has been established for the source per response to comments on the initial Title V permit issued to the source on February 18, 1998.

2. Page Four of the Statement of Basis, Credible Evidence section, appears to be incomplete. Please revise this section as appropriate.

Divisions Response:

The Division acknowledges the comment and has revised the section as suggested.

3. The draft Title V permit shows EUs SN-4, SN-5 and SN-6 (Knit /spiral Hose Lines 1, 2, & 3) as emission points contained in Section B. These EUs meet the Insignificant Activity Criteria that is listed on the KY DAQ web page for Insignificant Activities #9 (printing applicators) as referenced in 401 KAR 52:030. Please remove these EUs from Section B and apply to Section C – Insignificant Activities.

Divisions Response:

The Division acknowledges the comment. The regulation referred in the comment, 401 KAR 52:030 does not apply to this source. The correct regulation is 401 KAR 52:020. Emission units 4,5 and 6 (SN-4, SN-5, SN-6) cannot be considered as insignificant activity since the combined usage of material from the three units exceeds the 5 gallons per day limit specified on the KYDAQ web page for Insignificant Activities (#9)

4. The draft Title V permit shows EU SN-8 (Rubber Mill) as emission point contained in Section B. However, this EU meets the Insignificant Activity Criteria that is listed on the KY DAQ web page for Insignificant Activities #7. Please remove this EU from Section B and apply to Section C – Insignificant Activities. Also, please note that as no particulate emissions are generated, 401 KAR 59:010 does not apply.

Divisions Response:

The Division concurs with the comment and has revised the permit as suggested. Based on the information gathered from the field office personnel, 401 KAR 59:010 will not apply to the unit.

5. In section B of the draft Title V permit EU SN-23 has omitted VOC emission limitations for inks. Please revise the permit to reflect the 0.1 ton/month limit for ink VOC emission limitation as was permitted in the plant's current Title V permit.

Divisions Response:

The Division concurs with the comment and has revised the permit as suggested.

6. Please remove the descriptions for lines 11 (two cold cleaning degreasers), 12 (controlled pyrolysis cleaning furnace), and 13 (300 gallon diesel storage tank) from the list of insignificant activities in Section C, as all of these items are already listed in this section on lines 2, 1, and 3 respectively.

Divisions Response:

The Division concurs with the comment and has revised the permit as suggested.

7. Per information previously provided to KY DAQ on several occasions, the most recent being in an email to Esmail Hassanpour on 4/15/03, please remove line 14 (injection presses) from the list of insignificant activities in Section C, as these sources have been permanently removed from the plant.

Divisions Response:

The Division concurs with the comment and has revised the permit as suggested.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements.

At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.